

SEALED**UNITED STATES DISTRICT COURT**

for the

Northern District of Texas

FILED**August 24, 2020**KAREN MITCHELL
CLERK, U.S. DISTRICT COURT

United States of America

v.

JORGE LUIS GONZALEZ

Case No.

3:20-MJ-883-BH

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 23, 2020 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:*Code Section*

21 USC 841

Offense Description

Possession with the Intent to Distribute a Controlled Substance

This criminal complaint is based on these facts:

See attached Affidavit of DEA SA Adam West

☒ Continued on the attached sheet./s/ Adam West*Complainant's signature*Adam West, DEA SA*Printed name and title*

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 41(d)(3)

Date:

August 24, 2020*Judge's signature*City and state: Dallas, TexasIRMA CARRILLO RAMIREZ, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Adam West, after being duly sworn, depose and say as follows:

I. Introduction

1. My name is Adam West, and I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by law to conduct criminal investigations and to make arrests for federal felony offenses. I am a Special Agent with the Drug Enforcement Administration of the United States Department of Justice, and have been so employed since September 2019. I am currently assigned to the Dallas Field Division Office. In that capacity, I investigate violations of the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.). I have conducted complex investigations, and participated in numerous arrests and search warrants. I have written affidavits in support of court authorized federal warrants and orders for search warrants, GPS tracking of telephones and vehicles and pen registers. I have conducted interviews of drug traffickers, which has provided me with a greater understanding of the methods by which drug trafficking organizations operate. I am familiar with common methods of investigating drug trafficking and manufacturing organizations, and have become familiar with the methods of operation, including, but not limited to their methods of importing, exporting, storing, concealing, and packaging drugs and drug proceeds; their methods of transferring and distributing drugs; their use of cellular telephones and telephone; their use of numerical codes, code words, and counter surveillance; and other methods

of avoiding detection by law enforcement. Through my training and experience, I can identify illegal drugs by sight, odor, and texture.

II. Background

2. I have probable cause to believe that **Jorge Luis Gonzalez** violated 21 U.S.C. § 841 (a)(1), that is, possession with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

3. My knowledge of the facts alleged in this affidavit arise from my personal participation and observations in this investigation, my interviews of informants, and my review of reports prepared by investigators of the DEA Dallas Field Division and other participating law enforcement officers. Since this affidavit is limited to establishing probable cause, I have not included every fact known to me and other investigators. Rather, I am only submitting the facts necessary to establish probable cause that **Jorge Luis Gonzalez** committed the aforementioned violations of federal law.

III. Probable Cause

4. On August 23, 2020, officers from the Lancaster (Texas) Police Department (LPD) were dispatched to 4411 Trippie Street, Lancaster, Texas, in reference to a shooting complaint. Officers responded to the area and spoke with the complainant at another location, who advised while he/she was driving past the vacant lot at 4411 Trippie Street when two Hispanic males from the residence next door

(4413 Trippie Street) shot at the complainant's vehicle. The victim immediately left the area and contacted the Lancaster Police Department.

5. Officers responded to 4413 Trippie Street and observed several shell casings in the driveway. Officers knocked on the door and made contact with a male later identified as **Jorge Luis Gonzalez**, who initially claimed he had been sleeping. Officers then drove the complainant by this residence and he/she positively identified **Gonzalez** as being one of the males who shot at him/her. LPD then arrested **Gonzalez** for the Aggravated Assault with a Deadly Weapon, and while searching his person incident to arrest, officers recovered 28.9 grams of a substance believed to be methamphetamine in his pants pocket.

6. Officers entered **Gonzalez's** residence to conduct a protective sweep because of the complainant's report that there were two males involved in the shooting. While inside the residence, officers saw suspected marijuana, drug paraphernalia and a firearm in plain view. At this time, officers cleared the residence and stood by while investigators from the LPD Specialized Investigative Unit applied for a state search warrant. The warrant was reviewed and signed by the Honorable Judge Henry Campbell in Dallas, County.

7. Once the search warrant was signed, officers then conducted a systematic search of the residence and located the following: 181.8 grams of methamphetamine, 21.4 grams of heroin, three firearms, 13 bottles of promethazine

with codeine, and an undetermined amount of liquid methamphetamine. Lancaster PD then contacted DEA Dallas HIDTA III to assist in this investigation.

8. Based on my training and experience, I believe that the quantity of controlled substances located in **Gonzalez's** residence indicate they were intended for distribution. A field test was conducted on the crystalized methamphetamine and yielded a positive result for methamphetamine.

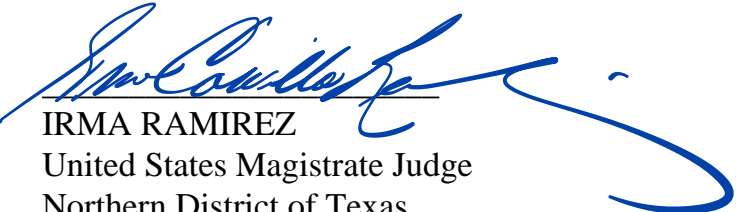
IV. Conclusion

Based upon the information contained in this affidavit, I believe that there is probable cause to believe that **Jorge Luis Gonzalez** has violated 21 U.S.C. § 841 (a)(1), that is, possession with intent to distribute a substance and mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

/s/ Adam West

Adam West
Special Agent
Drug Enforcement Administration

Sworn to before me this 24th day of August, 2020. Affiant's signature confirmed via reliable electronic means on this same date, pursuant to Fed. R. Crim. P. 41(d)(3).


IRMA RAMIREZ
United States Magistrate Judge
Northern District of Texas